

Thomas O. Forslund, Director

Governor Matthew H. Mead

BHD Bulletin

DATE: November 21, 2014

TO: All Behavioral Health Division Case Managers

FROM: Joe Simpson, Administrator
Behavioral Health Division - Developmental Disabilities Section

SUBJECT: Case Management Billable Unit Announcement

REF #: JS-2014-055

The Behavioral Health Division (Division) posted a draft amendment to the Supports and Comprehensive Waivers in October 2014 for public comment, which reflected proposed changes to the waivers, including the change to the 15 minute unit previously announced during the waiver redesign process in 2013. The Division appreciates the input and recommendations received from case managers, parents, providers and other stakeholders on the proposed amendments and the case management 15 minute unit issue. In response to significant public input on the change to a 15 minute case management unit, the Division has made the decision to continue to offer the opportunity for case managers to use the monthly case management unit until the waiver service rates can be rebased and approved by the legislature. Working with the participant, guardian and the participant's team, case managers can decide to use either the 15 minute unit or monthly unit.

Timeline for Submitting Modifications

Since many plans of care have the 15 minute unit due to start in January, and some case managers are already using it, the Division will implement a transition process to get the plans modified. This change will require significant work for case managers and state staff to accomplish during an already busy period of plan approvals and transitions from old waivers to new. In order to successfully change back to a monthly unit for case managers who wish to make the switch, the Division will use a transition process by plan of care start dates to get the plans modified within the next three (3) months. The Division will work with case managers to make these modifications occur as smoothly as possible. We are asking that case managers follow the timeline below to ensure that state staff can complete regular plan approvals and transitions to the new waiver timely. Modifications for changing the case management unit must be only for this purpose to make them go quickly. All other modifications to plans, other than for health and safety, should not be submitted during this time. For the unit modifications

Chris Newman, M.H.A., Senior Administrator

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to plans, standard procedures must be followed, including a new signature page with current dates, must be signed and uploaded with each modification. Modifications must have a first-of-the-month start date.

Modification Submission Timeline

Plan of care start dates	Due date to Submit Modifications back to a monthly unit
January	Submit change when plan is submitted by December 1, 2014
February, March, April, May	December 10, 2014
June, July, August	January 15, 2015
September, October, November, December	February 15, 2015

**You may submit modifications after these dates to switch unit types as well.*

As a reminder, the Division has seven days to approve modifications. Due to the high volume that may come in, the Division may need an additional week, which is reflected in the timetable above. Our goal is to have the modifications approved prior to the first of the next month, after they are submitted.

Questions

For questions on the modification process, contact your Division Participant Support Specialist. If you still have concerns or questions regarding the Division's decisions in this bulletin, please email bhdmail@wyo.gov so we can try to help. Thank you for your partnership through these changes.

Sincerely,



Joe Simpson, M.S., Ed.S.
Administrator

JS/jk/ja

enclosure

Additional Information on Case Management Unit Concerns

Background

The move to the 15 minute unit began in 2007-08 when the Centers for Medicaid and Medicare Services (CMS) released proposed rules requiring a 15 minute unit for all case management in the country. Due to significant input from states, CMS issued a moratorium on the 15 minute unit in March 2008, but kept other new standards for case management services in rule. These changes started the state's proposed change to the 15 minute unit back in 2008-09. The moratorium allowed the state to keep the monthly unit but with more stringent requirements for billable activities versus non-billable activities.

During the waiver redesign, the Division looked at each service and analyzed the best way to approach improvements to the waiver systems as a whole. Moving to conflict free case management and developing a more robust case management system were key components of the redesign. Initially, the announcement for this 15 minute unit change came out in the waiver redesign project with the conflict free model, which was posted for comment for several months. Although some comments were received at that time, the Division planned to move forward with the change starting in January 2015, which was communicated several times to providers. Due to the recent amendment public input process, the Division is reevaluating our approach and will not require this change in unit until after the rate rebasement is conducted.

The Division does not know if the moratorium will be rescinded by CMS. Therefore, a new rate, cost and time study on case management should be conducted to establish a current rate reimbursement methodology and study the options available for unit types. The rate, cost and time study will be conducted during FY 2015 by a contractor. Many case managers voiced that they want the rebasement done and will help with the time and cost study. The Division will need many case managers to take part in the study and track the billable and non-billable time and tasks spent per each case. They will also look at monthly documentation in case management files to help quantify time and activities conducted. As the contractor for this project is procured, the Division will issue a request to case managers to take part in the study. As a reminder of the process, rate rebasements are proposed to the legislature for approval, which will be reviewed in the 2016 legislative session at the earliest.

Addressing other Comments

Because of other comments and concerns submitted on the topic of case management, Chris Newman, Senior Administrator for the Behavioral Health Division, met with a group of case managers in Casper to hear their concerns and proposed solutions. The Division wants to address each concern with the Division's action plan or response to the concern.

Child DD and ABI participant clarification.

Will they be moving to 15 minute units?

Response:

- No, the 15 minute unit will not go into effect for those waivers.

Communication.

Case managers said they want more information to be put in writing in a formal manner so everyone is getting the same information and it is easily accessible.

Action items:

- The Division will develop a case management guide with information on billable activities that should be documented for the monthly unit. The case management guide will be released by December 9, 2014.
- Information and Case Management notices will be sent by email and posted to the CM forms webpage at: <http://health.wyo.gov/ddd/cminfopage.html>
- The formal announcement on the 15 minute unit in this bulletin will be sent via email and posted to the division's website at: <http://health.wyo.gov/ddd/memos.html>

Monthly Home Visit.

Case managers want to keep the monthly home visit and maybe have an exception process in certain circumstances where that isn't possible.

Response:

- The monthly visit will continue to be required for the monthly unit with no exception. The home visits for the 15 minute unit may be done according to the 15 minute unit case management guide.

Back up case managers.

Case Managers want written clarification on what is required for the backup case manager.

Action item:

- Specific information on the back up case manager requirements will be included in the case manager guide due to be released December 9, 2014.

Documentation requirements.

Case managers want improved documentation standards, forms and training provided to new case managers concerning documentation.

Response:

- The expectation of case management documentation is to record all billable activities conducted on a participant's behalf on a monthly basis, regardless of how many hours are provided. The case file on a participant must be able to stand alone in the case of a transition to a new provider.

Action items:

- The documentation standards will be clarified in the case management guide. The forms will not be revised at this time.
- We will hold a webinar to train case managers on how to better document notes for a person's case file according to Division standards.
- During the rate rebasement process, the documentation of the case management billable services will be closely monitored and studied so it will be important to have comprehensive notes for all billable activities performed each month, regardless of the 2-hour minimum.

Documentation review.

Case managers want more assistance from our local provider support person when reviewing documentation: is it adequate or is it lacking? If it is lacking, what additional information would the Division like to see. They want a partnership to work towards progress before issuing stiffer sanctions.

Action item:

- Division Specialists will receive retraining in December on working with case managers through targeted education and retraining in order to address documentation concerns and will issue corrective action plans as necessary to work with the case manager on improvements where needed.

Streamlining certification process and background check process for new people.

Action items:

- The process for background checks is being reviewed by the Division. We are working with Department of Family Services and the Division of Criminal Investigation to finalize an approach that should improve the timing of background checks. We will issue a bulletin when we have any changes in place and agreed upon by all state agencies.

Future plans

In response to requests for better technological solutions for documentation, the Division will also be working with software developers for the Electronic Medicaid Waiver System (EMWS) to enhance the system to record case management documentation. As this project is pursued, case managers will be contacted about the plans to gather input on the changes to the system.